

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE STATE OF WASHINGTON,)	
)	
Plaintiff,)	
)	
vs.)	No. 3:17-cv-05806-RJB
)	
THE GEO GROUP, INC.,)	SOME OF THE EXHIBITS AND
)	THE TESTIMONY REGARDING
Defendant.)	THEM HAVE BEEN DESIGNATED
)	AS CONFIDENTIAL.

DEPOSITION UPON ORAL EXAMINATION

OF

BRUCE SCOTT

10:02 a.m.
May 20, 2019

800 Fifth Avenue 2000
Seattle, Washington 98164



REPORTED BY: JACQUELINE L. BELLOWS, CCR 2297



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1 Seattle, Washington; May 20, 2019

2 10:02 a.m.

3 --oOo--

4
5 BRUCE SCOTT,

6 sworn as a witness by the certified court reporter,

7 testified as follows:

8
9 E X A M I N A T I O N

10 BY MS. CHIEN:

11 Q. Great. So my name is Marsha Chien. I
12 represent the -- sorry. I represent the State of
13 Washington. I just took a different deposition where I
14 represented a different agency.

15 So I know we just introduced each other. But
16 can you state your name for the record.

17 A. My name is Bruce A Scott, Jr.

18 Q. Have you been previously deposed?

19 A. Yes.

20 Q. About how many times?

21 A. Two times prior.

22 Q. Was it in the last five years?

23 A. One was in the last five years.

24 Q. So you may know some of these rules I'm about
25 to state. But I'm just going to go over them so we have



1 A. I don't think that's a specialized detail. I
2 think commissary, which is run by -- I don't know what
3 commissary does. They have a separate company.

4 Q. Are there -- do detainee workers work
5 commissary?

6 A. I don't know.

7 Q. I want to show you the document that I'm
8 trying to figure out.

9 (Deposition Exhibit No. 170 marked for
10 identification.)

11 Q (By Ms. Chien) Do you see this is an email
12 from Mike Snyder to you? This is Exhibit 170.

13 A. Yes.

14 Q. The subject, it says: "Detainee work
15 details."

16 A. Yes.

17 Q. Who's Mike Snyder?

18 A. Mike Snyder's a lieutenant.

19 Q. Do you recall this email?

20 A. I don't specifically recall this email.

21 Q. Do you see -- does -- it appears that he's
22 listing detainee work details. Then, he says, at the
23 last line: "Commissary detainees on delivery day."

24 A. I see that.

25 Q. Do you know what he's referring to?



1 A. I do not. I don't recall. The commissary is
2 run by a separate company that's not -- that's
3 contracted. I know in the past that they've had
4 workers. I don't know if they still have workers or if
5 Keefe, the commissary company -- I don't know how that
6 works. I don't recall how that works.

7 Q. You mentioned a time when detainee workers
8 might have worked in commissary; is that right?

9 A. I do recall commissary having assistance of
10 detainees years ago. I don't know how they do it now.

11 Q. Let's go back to when you knew it was
12 happening. Were those detainee workers that were
13 working for commissary working under the Voluntary Work
14 Program?

15 A. I don't know. I wasn't -- I don't know.

16 Q. Do you recall any problems -- sorry. How are
17 workers, detainee workers, assigned to the laundry area?

18 MR. DONAHUE: Object to the form.

19 A. They volunteer. Then first come-first served
20 based on the waiting list is how they would be picked.

21 Q (By Ms. Chien) Do detainee workers get to
22 decide -- or get to sign up for a specific waiting list
23 for laundry versus kitchen versus pod cleaner?

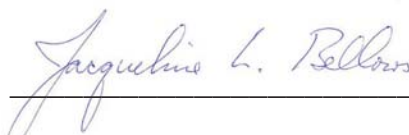
24 A. It depends. Some detainees want any Voluntary
25 Work Program. They say Give me anything. Some



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this 1st
day of June, 2019.



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